

**IN THE UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**ROOT, INC., et al.,**

**: Case No.: 2:23-cv-00512**

**Plaintiffs, : Judge Sarah Morrison**

**v.**

**: Magistrate Judge Chelsey Vascura**

**BRINSON CALEB “BC” SILVER, et :  
al.,**

**:**

**Defendants.**

**MOTION FOR EXTENSION OF TIME TO MOVE OR PLEAD**

Now come Defendants, Brinson Silver, Eclipse Home Design, LLC, and Collateral Damage, LLC, by and through undersigned counsel, and respectfully move the Court for an extension of time in which to move or plead. Defendants request their current deadline to move or plead be extended 21-days, from May 11, 2023 to June 1, 2023. This extension is necessary because, contemporaneous with this Motion, the undersigned have moved to withdraw as counsel for Defendants. Accordingly, this extension is necessary to ensure Defendants have ample time and opportunity to retain new counsel and move or plead in response to Plaintiff's Complaint. Accordingly, Defendants respectfully request an extension of time to move or plead to June 1, 2023. A proposed entry granting this Motion is being submitted contemporaneously for the Court's convenience.

Respectfully submitted,

/s/ Aaron M. Jones

David M. Scott (0068110)

Aaron M. Jones (0096386)

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*Silver Eclipse Home Design, LLC and*

*Collateral Damage, LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9<sup>th</sup> day of May 2023, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

A copy was also sent by ordinary U.S. Mail, postage prepaid, to the following:

Paige McDaniel  
5576 Alexanders Lake Road  
Stockbridge, GA 30281

/s/ Aaron M. Jones

Aaron M. Jones (0096386)